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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S RESPONSE TO AT&T'S SECOND  
NOTICE OF SCHEDULING ISSUES**

Qwest Corporation ("Qwest") hereby submits its response to the Second Notice of Scheduling Issues filed by AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T").

**Introduction**

In its Second Notice of Scheduling Issues, AT&T claims that it believes there may be a future need to adjust the current Procedural Order. Because AT&T's arguments are groundless, there is no basis for modification of the current Procedural Order.

AT&T's Second Notice of Scheduling Issues is premised on the unfounded notion that there are substantially more issues to be addressed in the Draft Final Report than expected. This ignores the approach the Test Advisory Group (TAG) agreed to take with regard to the individual draft reports. The TAG agreed to hold workshops on the individual draft reports as they were issued, rather than waiting until the Draft Final Report. This approach provided the CLECs with the opportunity for substantial input

early in the process and provided CGE&Y with the ability to address the issues raised earlier in the process. Given this approach, the parties always understood that the individual draft reports would be subject to some additional analysis and revision after the workshops. As expected, the workshops resulted in some additional analysis and revision that CGE&Y will incorporate into the Final Draft Report.

AT&T now points to this expected result as the basis for questioning CGE&Y's ability to produce the Draft Final Report as currently scheduled. As set forth below, AT&T's concerns are unsubstantiated.

### Argument

The primary basis for AT&T's Second Notice is that AT&T "believes it is unlikely" that the Draft Final Report due to the TAG on December 21, 2001 will be complete.<sup>1</sup> Specifically, AT&T lists nine issues it claims the Draft Final Report must address:

- 1) re-testing;
- 2) issues deferred from the prior workshops;
- 3) additional analyses addressed in prior workshops;
- 4) issues raised in the workshop on Qwest's stand-alone test environment (SATE );
- 5) issues relating to the Liberty reconciliation report raised in the workshop;
- 6) issues raised in the workshop regarding Qwest's change management process (CMP );
- 7) issues relating to the CGE&Y data reconciliation raised in the workshop;
- 8) other performance data issues raised in the workshop; and

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<sup>1</sup> AT&T's Second Notice of Scheduling Issues at 1.

9) IWOs not addressed in previous draft reports.

These issues do not justify AT&T's concerns.

First, items 1, 2, 3, and 4 (re-testing, issues and report revisions raised in prior workshops, and additional IWO closures) are not new or unexpected issues. All of the parties knew that these issues would be addressed in the Draft Final Report when the current Procedural Order was issued. By November 2, 2001, when that order was issued, the Retail Parity Evaluation, Relationship Management Evaluation, and Capacity Test workshops had all been held and the parties knew the quantum of issues deferred to and revisions required for the Draft Final Report arising from those workshop. Similarly, the parties knew that IWOs that remained open at the time of the prior workshops but were closed afterward would be addressed in the Draft Final Report.

Second, AT&T is simply wrong in claiming that issues relating to SATE might impact CGE&Y's ability to complete the Draft Final Report. Hewlett Packard, rather than CGE&Y, is conducting the evaluation of SATE. Hewlett Packard has already produced a preliminary report regarding its findings and will produce a final report on December 20, 2001. There is no reason for that separate evaluation to affect CGE&Y's issuance of its Draft Final Report.

Third, AT&T separately lists three issues -- the Liberty reconciliation report, CGE&Y data reconciliation, and other performance data issues -- that all relate to performance data. The Liberty report is a separate evaluation that is not part of CGE&Y's Draft Final Report. Further, CGE&Y's own data reconciliation report has already been issued. The Staff has devoted an entire workshop, which will be held December 13-14, 2001, to these issues. The only additional work that may be required

for the Draft Final Report may be updates to reflect the issues addressed during the workshop.

The CMP workshop was scheduled at Staff's request. Unlike the other OSS test workshops, the CMP workshop is not part of the draft report review process. Indeed, CGE&Y's analysis of Qwest's CMP was already addressed at the Relationship Management Evaluation workshop. No issues relating to CMP were deferred for future consideration in any other workshop. Thus, the workshop regarding CGE&Y's draft report on this issue has already been held; there is no new CGE&Y analysis to be discussed at the upcoming CMP. While CGE&Y may refine its report or close IWOs based on the information presented at the CMP workshop, its primary purpose is not a review of CGE&Y's analysis. Therefore, it is not likely to have a substantial impact CGE&Y's ability to produce a complete Draft Final Report.

Staff initially stated that CMP issues would be discussed in the Final Report workshop. Staff has now scheduled a separate CMP workshop to be held December 17-18, 2001. Given that Staff originally did not intend to discuss CMP before the Final Workshop, it clearly did not intend for CGE&Y Draft Final Report to address any issues that would be raised during that discussion. The separate CMP workshop simply allows the parties to discuss CMP issues even earlier than was previously planned and reduces the agenda for the Final Report workshop.

Finally, AT&T suggests that the time currently allocated for the scheduled Final Report workshop may be insufficient. The parties' collective experience throughout the draft report review workshops suggests otherwise. All of the prior workshops were concluded in less than the allocated time -- frequently as much as an entire day early.

There is thus no basis for AT&T's current concern about the amount of time allocated for the Final Report workshop.

**Conclusion**

The issues AT&T listed are not new or unanticipated issues. Rather, these issues were known at the time the current schedule, including the December 21 due date for the Draft Final Report, was set. These issues, therefore, do not support AT&T's concern that the Draft Final Report may not be complete by December 21. In any event, it would be premature to modify the Procedural Order based on unsupported speculation.

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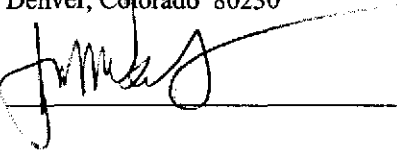
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